To: Kramek, Niva[kramek.niva@epa.gov]

From: Adam Finkel

Sent: Fri 5/19/2017 6:07:20 PM

Subject: Re: was DCM extension granted?

I forgot to mention-- I didn't have time to fully document all the datafields in the spreadsheet I attached-- if anyone at EPA wants me to explain some of the columns (for example, "P" always means "personal air sample" as opposed to an area sample-- I deleted all the area samples to focus on the more accurate personal ones), I'm always happy to. The written comments really stand for themselves, and I don't really expect anyone to analyze the data in the spreadsheet, but didn't want to be accused of using "secret science"!

Adam

Adam M. Finkel, Sc.D.

Senior Fellow and Executive Director, Penn Program on Regulation, University of Pennsylvania Law School and Clinical Professor of Environmental Health Sciences, University of Michigan School of Public Health

From: Kramek, Niva < kramek.niva@epa.gov>

Sent: Friday, May 19, 2017 12:52 PM

To: Adam Finkel

Subject: RE: was DCM extension granted?

Thank you, and thank you for your comments!

Niva

Niva Kramek

Existing Chemicals Branch, Chemical Control Division

Office of Chemical Safety and Pollution Prevention

US Environmental Protection Agency

202-564-4830

Kramek.niva@epa.gov

From: Adam Finkel Ex. 6 - Personal Privacy Sent: Friday, May 19, 2017 12:47 PM To: Kramek, Niva < kramek.niva@epa.gov> Subject: Re: was DCM extension granted? thanks for the help on the phone just now-- I successfully submitted the 2 attached files, and am happy to have them appear next week after the deadline-- I can't see any substantive comments from my friends at HSIA, so I'm happy to have them not see mine until it is too late to "rebut" (air quotes"). best regards, Adam Adam M. Finkel, Sc.D. Senior Fellow and Executive Director, Penn Program on Regulation, University of Pennsylvania Law School and Clinical Professor of Environmental Health Sciences, University of Michigan School of Public Health From: Kramek, Niva < kramek.niva@epa.gov> Sent: Wednesday, April 19, 2017 8:45 AM To: Adam Finkel Subject: RE: was DCM extension granted? Thank you! I realized after I sent the email I forgot to include the details from our OPPT Listserv. I'm glad the details reached you. We look forward to receiving your comments.

Thank you -

Niva

Niva Kramek

Existing Chemicals Branch, Chemical Control Division

Office of Chemical Safety and Pollution Prevention

US Environmental Protection Agency

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Kramek.niva@epa.gov

From: Adam Finkel Ex. 6 - Personal Privacy

Sent: Wednesday, April 19, 2017 8:39 AM To: Kramek, Niva < kramek.niva@epa.gov> Subject: Re: was DCM extension granted?

thanks, Niva-- I had heard through an NGO friend that a short extension was likely, and I saw the change in the e-docket sometime yesterday afternoon. You'll be hearing from me on 5/19- in addition to some legal and toxicological comments, I will send along a spreadsheet with about 12,000 results from OSHA air monitoring for MeCl2 over the past 20 years, comparing the range and distribution of levels found pre- and post-1999 (when our 25 ppm rule went into full effect).

Adam

Adam M. Finkel, Sc.D.

Senior Fellow and Executive Director, Penn Program on Regulation, University of Pennsylvania Law

Clinical Professor of Environmental Health Sciences, University of Michigan School of Public Health

From: Kramek, Niva < kramek.niva@epa.gov>

Sent: Tuesday, April 18, 2017 6:14 PM To: Adam Finkel
Subject: RE: was DCM extension granted?
Hi Adam –
Thank you for the email earlier regarding the paint removers notice of proposed rulemaking. Earlier today, EPA extended the comment period for this rule, until May 19. Please see the email below for more details.
Thanks –
Niva
Niva Kramek
Existing Chemicals Branch, Chemical Control Division
Office of Chemical Safety and Pollution Prevention
Office of Chemical Safety and Pollution Prevention US Environmental Protection Agency
·
US Environmental Protection Agency
US Environmental Protection Agency 202-564-4830

I may be simply failing to read the docket correctly online, but has EPA ruled on the HSIA extension request it sent on March 17? In other words, are comments on the proposed restrictions on MeCl2 (and NMP) still due on April 19, or has that deadline been pushed back?

thanks for letting me know, sometime between now and about April 17 when I'd otherwise start writing a short comment of my own.

Adam Finkel

Adam M. Finkel, Sc.D.

Senior Fellow and Executive Director, Penn Program on Regulation, University of Pennsylvania Law School and

Clinical Professor of Environmental Health Sciences, University of Michigan School of Public Health